

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

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JANE DOE, an individual,

Plaintiff,

Civil Case No.:
1:22-cv-00381-LEW

vs.

MISSIONARY OBLATES OF MARY IMMACULATE
EASTERN PROVINCE, MISSIONARY OBLATES OF
MARY IMMACULATE, INC., and U.S. PROVINCE OF
THE MISSIONARY OBLATES OF MARY
IMMACULATE, INC.,

Defendants.

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JOINT MOTION FOR EXTENSION OF TIME
TO COMPLETE EXPERT DISCOVERY

NOW COME the parties in the above-captioned-matter, by and through the undersigned attorneys, and submit this motion, jointly, to request a short extension of time to complete expert depositions, for an extension of dispositive motion deadlines, and for a continuance of the trial-ready date. In support of this application, the parties state the following:

1. **Current Scheduling Order** - Pursuant to the Court's December 7, 2023, docket Order (ECF 67), all discovery is to be completed by **April 4, 2024**; written notice of intent to file motions for summary judgment are due **April 11, 2024**; dispositive motions are due **April 18, 2024**; and a trial ready date has been set for **June 3, 2024**.

2. **Completed Discovery** - At the parties' December 7, 2023, status conference we advised the Court that the parties had reached agreements relative to Defendants' outstanding discovery demands. In the ensuing weeks, the documents requested by the Defendants were produced by Plaintiff (and non-party, Fall River Diocese, pursuant to subpoena), and Defendants exchanged the

disclosures of their expert witnesses, James I. Hudson, M.D. (psychiatrist), and Deryn Strange, Ph.D. (memory). At this point, we believe that paper discovery is complete.

3. **Outstanding Discovery** - Based on the documents disclosed, and new allegations in the Amended Complaint, by agreement of the parties, a further deposition of Plaintiff will be conducted (via Zoom) on March 28, 2024.

4. In addition, the parties have been in communication over the last several weeks attempting to schedule expert depositions; however, due to counsels' and the witnesses' professional conflicts, the need to arrange travel to New York, and the upcoming Easter holiday, the depositions could not be scheduled until after the April 4, 2024, close of discovery deadline.

5. Currently, Plaintiff's expert, Dr. Paula Eagle, is scheduled to be deposed on April 8, 2024, and Drs. Hudson and Strange are scheduled to be deposed on April 9, 2024. As such, we write to request a one week extension of the discovery deadline to April 11, 2024, to accommodate the foregoing schedule.

6. We also request a brief extension of the April 11, 2024, deadline to file written notice(s) of intent to file any motion(s) for summary judgment to and including **April 18, 2024**, and for an extension of the April 18, 2024, dispositive motion deadline to and including **May 3, 2024**, to allow time to receive deposition transcripts and adequately prepare any *Daubert* and summary judgment motion(s). And finally, we request a brief continuance of the June 3, 2024, trial-ready date, to a date to be determined at the Court's discretion.

7. In light of the parties' demonstrated efforts to work amicably and expeditiously to complete fact and expert discovery, the parties respectfully submit that good cause exists for the extensions requested herein.

WHEREFORE, the parties jointly request that the foregoing deadlines be extended, and further state that the undersigned are available at the Court's convenience should the Court wish to convene a status conference in connection with this motion.

Dated: March 27, 2024

Respectfully submitted,

/s/ Sara E. Thompson
Sara E. Thompson (*pro hac vice*)

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-with-

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on **March 27, 2024**, the foregoing motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties or their respective representatives by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's electronic filing system.

/s/ Sara E. Thompson
Sara E. Thompson